

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

KATIANA SOENEN,  
CARTER WOODRUFF,  
TAJA HIRATA-EPSTEIN,  
CHLOE BURNS  
and on behalf of all others similarly situated,

*Plaintiffs,*

V.

BROWN UNIVERSITY,

*Defendant.*

C.A. No. 1:21-cv-00325-JJM-PAS

**DEFENDANT BROWN UNIVERSITY'S  
MOTION TO DISMISS PLAINTIFFS' CLAIMS,  
STRIKE THE CLASS ACTION ALLEGATIONS  
AND/OR SEVER CLAIMS**

Applying Federal Rule of Civil Procedure 12(b)(6), Defendant Brown University ("Brown") moves to dismiss Plaintiffs' Complaint for its failure to state any claims upon which relief can be granted. Each of the four named Plaintiffs has failed to plead any plausible claims in the Complaint's eleven counts.

If any of the named Plaintiffs' claims are allowed to proceed, Brown moves to strike their class action allegations as implausible, applying the rigorous review required under Federal Rule of Civil Procedure 23 and United States Supreme Court precedent. The class action allegations should be stricken now because Plaintiffs cannot possibly satisfy the requirements for a class action going forward.

Finally, if any claims survive, the named Plaintiffs should not be allowed to litigate collectively in one action. Each should be required to proceed in a separate action. Plaintiffs fail to meet Rule 20's requirements for permissive joinder, and severance is proper under Rule 21.

Brown has filed a brief stating its legal arguments in support of this motion. Brown requests that the Court hold a hearing on the motion and estimates that the hearing will span approximately ninety (90) minutes on the Court's calendar.

BROWN UNIVERSITY

By Its Attorneys,

*/s/ Steven M. Richard*

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Dated: November 19, 2021

**CERTIFICATION**

I certify that, on November 19, 2021, this motion and its supporting brief were filed and served electronically via the Court's CM/ECF system.

*/s/ Steven M. Richard*